LAW OFFICES OF SCOTT E. LEEMON, P.C.

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Via ECF

Honorable Vernon S. Broderick United States District Court Southern District of New York 40 Foley Square New York, NY 10007 APPLICATION GRANTED SO ORDERED A VERNON S. BRODERICK U.S.D.J. 4/10/2025

Mr. Lacaj is permitted to travel to South Florida from May 1, 2025 through May 5, 2025 and is to provide Pretrial services with the travel details before he leaves.

Re: <u>United States v Steven Lacaj, 24 CR 362 (VSB)</u>

Dear Judge Broderick,

I am counsel for Mr. Lacaj and write to respectfully request that his bail conditions be amended to permit him to travel from New York to South Florida (Boca Raton area) from May 1, 2025 through May 5, 2025.

He will be going on a business trip in connection with his Airbnb business.

His pre-trial officer, Karina Chin Vilefort informs me that she has no objection to the proposed trip if she is provided all of Mr. Lacaj's travel details before he leaves, which I will do. She also requested that he notifies her when he returns. Since his initial positive drug test, Mr. Lacaj has been fully complaint with the terms of his release.

AUSA Adam Hobson advise me that he defers to Pre-trial's position on the request.

I thank you in advance for your consideration.

Very truly yours,

Scott E. Leemon

cc: Karina Chin Vilefort, USPTS (via email) AUSA Adam Hobson (via ECF)